

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

KEVIN CORDELL HERRON,

Defendant.

Case No. 2:21-mj-30167

Assigned To : Unassigned

Assign. Date : 4/9/2021

SEALED MATTER (kcm)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 4, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

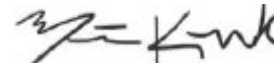
18 U.S.C. § 924(c)(1)(a)

Possession with Intent to Distribute Cocaine Base

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: April 09, 2021City and state: Detroit, Michigan

Complainant's signature

Special Agent Matthew Kuiack, FBI

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

KEVIN CORDELL HERRON,

Defendant.

Case No. 21-mj-30167

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Kuiack, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since July 2019. I am currently assigned to the FBI Detroit Field Office and the Violent Gang Task Force (VGTF), and my current duties include investigating gangs, firearms trafficking, and narcotics trafficking. Prior to my present assignment, I was a Sheriff's Deputy with the Mitchell County Sheriff's Office, Mitchell County, Kansas. During my time as a law enforcement officer and Special Agent, I have participated in investigations involving firearms and illegal narcotics, as well as numerous investigations that resulted in the execution of search and arrest warrants.

2. I submit this affidavit in support of a criminal complaint charging that, on or about September 4, 2020, within the Eastern District of Michigan, the defendant, Kevin Cordell HERRON (D.O.B.: XX/XX/1987), knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and knowingly possessed a firearm in furtherance of that drug trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A).

3. I make this affidavit from personal knowledge as well as information provided by other law enforcement officials and/or their reports and records. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation.

### **PROBABLE CAUSE**

4. On or about September 4, 2020, at approximately 10:26 p.m., two Michigan State Police (MSP) Troopers were driving in a marked patrol car in Inkster, Michigan, in the vicinity of Glenwood Street and Harrison Street, when they observed a 2020 dark blue Infiniti QX80 SUV, bearing Michigan license plate DPR5683, traveling at a high rate of speed and disregarding several stops signs. As a result, the Troopers initiated a traffic stop of the vehicle for reckless driving.

5. The Infiniti SUV came to a stop in the driveway of XXXX Northwood Drive, Inkster, Michigan, which is within the Eastern District of Michigan.

6. MSP Trooper Tasker approached the driver, subsequently identified as HERRON, while Trooper Martinez made contact with the front passenger. As Trooper Tasker approached the driver's side of the vehicle, he observed HERRON reaching underneath his leg near the driver's seat and center console. Trooper Tasker opened the driver's door and instructed HERRON to place his hands on the steering wheel so that the Trooper could place HERRON under arrest for reckless driving. HERRON ignored the Trooper's commands and continued to reach toward the center console, and as a result Trooper Tasker removed HERRON from the vehicle and placed him under arrest in front of the MSP patrol car.

7. After Trooper Martinez had the front passenger exit the vehicle, Trooper Martinez returned to the driver's side of the Infiniti SUV and observed a black pistol on the driver's side floorboard. Trooper Martinez secured the pistol and cleared it. The pistol was a Glock 29, 10mm caliber pistol, bearing serial number BNTG722. The pistol was loaded with one round in the chamber and a magazine inserted.

8. The MSP Troopers searched HERRON incident to his arrest and found the following: (i) a Glock magazine loaded with 10mm ammunition in his

left pants pocket; (ii) \$5,400 in cash in his left pants pocket; and (iii) a large plastic bag containing a white, chunky substance in his right jacket pocket.

9. The plastic bag contained “rocks” individually wrapped in plastic, which the Troopers suspected to be cocaine base, also known as “crack.” Trooper Martinez field tested the white substance and obtained a positive result for cocaine. The total weight of the suspected cocaine base and packaging was approximately 19.5 grams.

10. In total, the Troopers found and seized two magazines and 24 rounds of 10mm ammunition.

11. Later, while HERRON was being processed at the Inkster Police Department, he stated, “Man, don’t take my money, just take the Glock.”

12. The Infiniti SUV that HERRON had been driving was registered to EAN Holdings, LLC, which does business as Enterprise Rent-A-Car.

13. Based on my training and experience and my conversations with senior law enforcement agents with years of experience investigating narcotics trafficking, I know that:

- a. A quantity of approximately 19.5 grams of crack cocaine is consistent with distribution and is not consistent with personal use.
- b. The estimated street value of approximately 19.5 grams of crack cocaine is almost \$2,000.

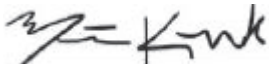
- c. A quantity of narcotics packaged in separate, individual packaging is consistent with distribution and is not consistent with personal use.
- d. Drug dealers often possess large amounts of U.S. currency as the proceeds of their drug distribution activity.
- e. Drug dealers often possess firearms—and often in quickly accessible locations—to protect their drugs and drug proceeds.
- f. Drug dealers often use rental vehicles for their drug distribution activity as a way to avoid law enforcement detection and distance themselves from a particular vehicle and its contents if the vehicle is stopped and searched by law enforcement.

14. I have reviewed HERRON's computerized criminal history report ("CCH"), as well as publicly available records from the Third Circuit Court, Wayne County, Michigan, which revealed he is a convicted felon. Specifically, in 2007, he was convicted of one count of Assault with intent to rob while unarmed and one count of Felony firearm.

**CONCLUSION**

15. Based on the foregoing, I respectfully submit there is probable cause to believe that, on or about September 4, 2020, within the Eastern District of Michigan, Kevin Cordell HERRON knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and knowingly possessed a firearm in furtherance of that drug trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A).

Respectfully submitted,

By:   
\_\_\_\_\_  
Matthew Kuiack  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in  
my presence and/or by reliable electronic means.



\_\_\_\_\_  
HON. CURTIS IVY, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF MICHIGAN

Date: April 9, 2021

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for the  
Eastern District of Michigan

United States of America  
v.  
KEVIN CORDELL HERRON,  
  
Defendant.

Case No. 2:21-mj-30167  
Assigned To : Unassigned  
Assign. Date : 4/9/2021  
SEALED MATTER (kcm)

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) KEVIN CORDELL HERRON,  
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment      ☐ Superseding Indictment      ☐ Information      ☐ Superseding Information      ☒ Complaint  
☐ Probation Violation Petition      ☐ Supervised Release Violation Petition      ☐ Violation Notice      ☐ Order of the Court

This offense is briefly described as follows:

21 U.S.C. § 841(a)(1)      Possession with Intent to Distribute Cocaine Base  
18 U.S.C. § 924(c)(1)(a)      Possession of a Firearm in Furtherance of a Drug Trafficking Crime

Date: April 09, 2021

City and state: Detroit, Michigan



\_\_\_\_\_  
Issuing officer's signature

Hon. Curtis Ivy, Jr., U.S. Magistrate Judge  
\_\_\_\_\_  
Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
Arresting officer's signature

\_\_\_\_\_  
Printed name and title



**This second page contains personal identifiers provided for law-enforcement use only  
and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: Kevin Cordell Herron

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties:

\_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: 09/23/1987

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks:

\_\_\_\_\_

History of violence, weapons, drug use:

\_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*):

\_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto:

\_\_\_\_\_

Investigative agency and address:

\_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*):

\_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*):

\_\_\_\_\_